

**STATE OF NEW HAMPSHIRE
INSURANCE DEPARTMENT**

**In re: Alieria Healthcare, Inc. (dba The Alieria Companies, Inc.)
& Trinity Healthshare Inc.**

**Docket No.: INS 19-027-EP
Docket No.: INS 20-014-EP
Docket No.: INS 20-015-EP**

**NHID'S NOTICE TO WITHDRAW REFERENCE TO THE REQUIREMENT THAT THE
RESPONDENT'S LIMIT PARTICIPATION TO INDIVIDUALS WHO SHARE A COMMON
SET OF EITHER ETHICAL OR RELIGIOUS BELIEFS**

The New Hampshire Insurance Department (NHID) by and through its counsel, moves to withdraw select paragraphs from its Cease and Desist and Orders to Show Cause relating to the current administrative actions pending against Respondent's Alieria Healthcare, Inc., dba The Alieria Companies, Inc., ("Alieria") and Trinity Healthshare, Inc. ("Trinity"), and in support states as follows:

1. On October 10, 2019, the NHID issued a Cease and Desist to both Respondents, Alieria and Trinity, ordering them to stop engaging in any activities which would be in violation of New Hampshire's insurance code, specifically alleging that both entities were operating as an unlicensed insurance company by not meeting the requirements of a health care sharing organization under RSA 126-V:1, and also alleging that Respondents misrepresented themselves to consumers as a valid health care sharing organization.
2. Paragraph 25 of the Cease and Desist alleges, in part, that, "Trinity also fails to establish that it is faith based and limits its membership to individuals who share a common set of ethical or religious beliefs."
3. Paragraph 25 is withdrawn by the NHID in its entirety from the Cease and Desist; the NHID will not be relying upon nor arguing said factual statement or legal allegation for the administrative action against either Respondent.
4. On March 10, 2020, NHID issued an Order to Show Cause and Notice of Hearing as to Respondent Trinity, stating in substantial part that Trinity is operating as an unlicensed insurance company as it does not meet the requirements of a health care sharing

organization under RSA 126-V:1, and because it misrepresents itself to consumers as a valid health care sharing organization.

5. Paragraph 9 of that Order to Show Cause and Notice of Hearing states in full: "Trinity does not limit its membership to individuals holding any particular religious or ethical beliefs, and only requires its enrollees to agree to a series of general belief statements."
6. Paragraph 26 of that same Order to Show Cause asserts, in part, that, "Trinity also fails to establish that it is faith based and limits its membership to individuals who share a common set of ethical or religious beliefs."
7. Paragraphs 9 and 26 are withdrawn by the NHID in their entirety from the Order to Show Cause; the Department will not be relying upon nor arguing said factual statement or legal allegation for the administrative action against Respondent Trinity.
8. On March 10, 2020, NHID issued an Order to Show Cause and Notice of Hearing as to Respondent Alieria, stating in substantial part that Alieria is in violation New Hampshire law because, through its business partnership with Trinity, it is marketing, soliciting, and administering Trinity products. The Order to Show Cause also states that Alieria is in violation of New Hampshire law by misleading consumers about the nature of Trinity's products.
9. As above, Paragraph 28 of the Order to Show Cause relative to Alieria states in part that: "Trinity also fails to establish that it is faith based and limits its membership to individuals who share a common set of ethical or religious beliefs."
10. Paragraph 28 is withdrawn by the NHID in its entirety from the Order to Show Cause; the Department will not be relying upon nor arguing said legal allegation for the administrative action against Respondent Alieria.

Respectfully Submitted,

NEW HAMPSHIRE INSURANCE DEPARTMENT

Date: 7/16/2020



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M. Bleier for

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Associate Enforcement Counsel

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing was sent on July 16, 2020 electronically to all parties identified in the April 9, 2020 service list.

M. Bleier

Mary Bleier, Esq. and Joshua Hilliard, Esq.